

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

TERESA PRICE,)	
)	
)	
)	
v.)	
)	
TRANS UNION LLC and FINANCIAL)	
RECOVERIES,)	
)	
)	
Defendants.)	

C.A. No: 2:09-cv-01332-ER

TRANS UNION LLC’S REQUEST FOR FEES

Defendant Trans Union LLC (“Trans Union”), pursuant to this Court’s March 16, 2012 Order Granting Trans Union’s Motion for Sanctions {Docket #138}, requests attorney’s fees and paralegal fees in the total amount of \$10,160.00: 42.5 hours for Bruce S. Luckman, Esq. at \$200.00/hr; 8.00 hours for Patricia J. Reid, paralegal, at \$95.00/hr; and 4.5 hours for Timothy P. Creech, Esq. at \$200.00/hr.

1. Attached to this Request is the Declaration of Patricia J. Reid, paralegal at Kogan, Trichon & Wertheimer, P.C. and the following Exhibits thereto:

Exhibit A: itemized billing records of Bruce S. Luckman, Esq. between October 20, 2009 and February 26, 2010;

Exhibit B: itemized billing records of Patricia J. Reid, relating to her reissuing of subpoenas, as well as her time for compiling time records for this Request; and

Exhibit C: itemized billing records of Timothy P. Creech, Esq. for preparing the instant request, including review of the bills, review of the motions and materials that were billed, subtraction of impertinent time, and preparation of the instant motion.

2. This motion seeks reasonable compensation for attorney's fees incurred as a result of Plaintiff's counsel's sanctioned conduct. Trans Union requests only reimbursement of attorney's fees for its lead counsel. Mr. Luckman was lead counsel between October 2009 and February 2010; no attorney's fees are sought for Mr. Creech's time (or any other attorney for Trans Union) at that time. *See Exhibit A*. Certain items on *Exhibit A* are "block bill" time entries that relate to the instant request and other matters. The irrelevant portions of the entries have been stricken through and time deducted based on a reasonable estimation of what time relates to Plaintiff's counsel's sanctionable conduct.

3. Trans Union also seeks reimbursement of fees for paralegal time related to preparing the motion for sanctions and reissuing the subpoenas in 2009-2010; and in preparing the bills for the instant request for fees. *Exhibit B*. Paralegal time in the nature of secretarial support, for example redacting the bills and signing the Declaration on March 26, 2012 are not included in the instant request for fees.

4. One matter of note that is not self-explanatory on the bills is that Trans Union requests fees related to its January 6, 2010 motion for extension of time to complete discovery {Docket #25}, which Plaintiff opposed on January 19, 2010 {Docket #28}. This motion was necessitated by Plaintiff's interference with Trans Union's subpoenas. *See* Docket #31, Order, *inter alia*, granting Trans Union's motion for extension of time.

5. Trans Union does not seek reimbursement of fees incurred for the renewal of the motion for sanctions on July 15, 2011. It was submitted with the unsuccessful renewed motion for sanctions and, for the most part, it incorporated the prior arguments as to why Plaintiff's counsel's conduct was sanctionable.

6. Trans Union seeks reimbursement of fees that the undersigned counsel will bill for the preparation of the instant motion for sanctions. The preparation of this request required review of the billing history of Trans Union's former lead counsel and his available notes and correspondence; the motion for sanctions and reply; and the motion to extend and the opposition, as well as contemporaneous issues to determine what should reasonably be billed as sanctions for Plaintiff's counsel's conduct.

Respectfully submitted,

KOGAN, TRICHON & WERTHEIMER, P.C.

/s/ Timothy P. Creech

TIMOTHY P. CREECH

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*Counsel for Defendant,
Trans Union LLC*

DATED: March 26, 2012

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FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

TERESA PRICE,)	
)	
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	Plaintiff,	
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v.)	C.A. No: 2:09-cv-01332-ER
)	
TRANS UNION LLC; and)	
FINANCIAL RECOVERIES,)	
)	
	Defendants.	

CERTIFICATE OF SERVICE

Timothy P. Creech, Esq., certifies that he caused a true and correct copy of the foregoing Trans Union LLC's Request for Fees to be sent on this date *via* ECF Notification to the following ECF Registered Users:

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Counsel for Plaintiff

/s/ Timothy P. Creech

TIMOTHY P. CREECH

DATED: March 26, 2012